

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS, DEL RIO DIVISION

United States of America

vs.

(1) Reginald Davis
(2) Arkirra Raynell-Nicole Brown
(3) Angel David Espinoza
(4) Jalon Branscomb
(5) Jamarko Curry

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CRIMINAL COMPLAINT

CASE NUMBER: DR:23-M -01600(1,2,3,4,5)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about **May 24, 2023** in **Val Verde** county, in the **WESTERN DISTRICT OF TEXAS** defendant(s) did, conspire with other unnamed co-conspirators, to transport, or move or attempt to transport or move, certain persons, knowing or in reckless disregard of the fact that that such persons were aliens illegally present in the United States, a felony,

in violation of Title **8** United States Code, Section(s) **1324(a)(1)(A)(v)(I)**

I further state that I am a(n) and that this complaint is based on the following facts: *"On May 24, 2023, defendants Reginald Davis, Akirra Brown and Jamarko Curry were encountered by Border Patrol Agents near Del Rio, Texas, within the Western District of Texas. Border Patrol Agents had observed a white 2013 Ford Fusion and a gray 2008 Dodge Charger traveling in tandem, pull over to the side of the road and witnessed several people flee the vehicles. Border Patrol Agents apprehended nine individuals who*

Continued on the attached sheet and made a part of hereof.

Sworn to before me and subscribed in my presence,


/s/ JESTER, MICHAEL
Signature of Complainant
JESTER, MICHAEL

05/30/2023

File Date

at DEL RIO, Texas
City and State

COLLIS WHITE
UNITED STATES MAGISTRATE JUDGE


Signature of Judicial Officer

WESTERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA

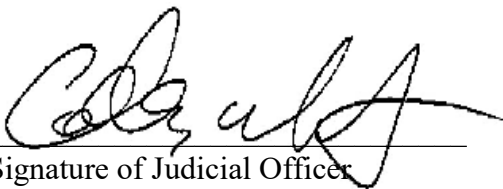
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Continuation of Statement of Facts:

fled the vehicles and determined they were citizens of Mexico and illegally present in the United States. Agents located the same two vehicles as well as a 2016 Honda Civic. Agents determined during an investigation that all subjects knew and were in contact with each other and were involved in a conspiracy of transporting illegal aliens. The defendants provided sworn statements which implicated they were being paid to transport illegal aliens."


Signature of Judicial Officer

/s/ JESTER, MICHAEL
Signature of Complainant